

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
JOANN INC., <i>et al.</i> <sup>1</sup> ,	Case No. 25-10068 (CTG)
Debtors.	(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICES**

PLEASE TAKE NOTICE, that the undersigned counsel hereby enter their appearance for BMA JC LLC; Brixmor Operating Partnership LP; Federal Realty OP LP; Hutensky Capital Partners, LLC; RD Management, LLC; Shopping Center Associates, LP; TPP 217 Taylorsville, LLC; The Sterling Organization; and Westford Valley Marketplace, Inc. (collectively, the “Landlords”), pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*, Rules 2002, 3017, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure and Rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and request that copies of all pleadings, motions, notices and other papers filed or served in this bankruptcy case, be served upon the Landlords through their undersigned counsel, as follows:

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

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PLEASE TAKE FURTHER NOTICE, that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Appearance and Request for Notices* nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed or construed to constitute a waiver of any substantive or procedural right of the Landlords including, without limitation, (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court, or (v) any

other rights, claims, actions, defenses, setoffs, or recoupments to which the Landlords are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until the Landlords expressly state otherwise, Landlords do not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: February 7, 2024  
Wilmington, Delaware

Respectfully submitted,

/s/ Leslie C. Heilman

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